

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address J. Bennett Friedman, Esq. (SBN 147056) Michael Sobkowiak, Esq. (SBN 242718) Friedman Law Group, P.C. 1900 Avenue of the Stars, 11th Fl. Los Angeles, CA 90067 T: (310) 552-8210; F: (310) 733-5442 E: jfriedman@flg-law.com; msobkowiak@flg-law.com	FOR COURT USE ONLY
<input type="checkbox"/> <i>Individual appearing without attorney</i> <input checked="" type="checkbox"/> Attorney for: Plaintiffs	
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION	
In re: Mark Elias Crone, <div style="text-align: right;">Debtor(s).</div>	CASE NO.: 2:17-bk-12392-BR ADVERSARY NO.: 2:17-ap-01289-BR CHAPTER: 7
CKR Global Advisors, Inc. and Jeffrey A. Rinde, <div style="text-align: right;">Plaintiff(s).</div> <div style="text-align: center;">vs.</div> Susan Crone, Gary Gorham and Leonidas P. Flangas, <div style="text-align: right;">Defendant(s).</div>	<div style="text-align: center;"> JOINT STATUS REPORT [LBR 7016-1(a)(2)] </div> <div style="margin-top: 10px;"> DATE: 04/30/2019 TIME: 10:00 a.m. COURTROOM: 1668 ADDRESS: 255 E. Temple St. Los Angeles, CA 90012 </div>

The parties submit the following JOINT STATUS REPORT in accordance with LBR 7016-1(a)(2):

A. PLEADINGS/SERVICE:

- | | |
|---|---|
| 1. Have all parties been served with the complaint/counterclaim/cross-claim, etc. (Claims Documents)? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. Have all parties filed and served answers to the Claims Documents? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 3. Have all motions addressed to the Claims Documents been resolved? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 4. Have counsel met and conferred in compliance with LBR 7026-1? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

5. If your answer to any of the four preceding questions is anything other than an unqualified "YES," please explain below (*or on attached page*):

B. READINESS FOR TRIAL:

1. When will you be ready for trial in this case?

Plaintiff

The parties have entered into a settlement dependent on finalizing a separate settlement with the Ch. 7 Trustee. If not finalized, then July 31, 2019.

Defendant

The parties are negotiating a settlement. Defendant will know if the negotiation will be finalized or if there is no deal by the upcoming status hearing.

2. If your answer to the above is more than 4 months after the summons issued in this case, give reasons for further delay.

Plaintiff

Defendant

3. When do you expect to complete your discovery efforts?

Plaintiff

If the settlement is not completed, Susan Crone's deposition may be taken. The deposition, if taken, will be in May 2019. All other discovery is complete.

Defendant

If the settlement is not completed, Susan Crone's deposition may be taken if there is no settlement. the deposition will be in May 2019 if taken.

4. What additional discovery do you require to prepare for trial?

Plaintiff

Please see response to section no. B.3. immediately above.

Defendant

Discovery is complete except for the possible deposition of Susan Crone.

C. TRIAL TIME:

1. What is your estimate of the time required to present your side of the case at trial (*including rebuttal stage if applicable*)?

Plaintiff

3 days

Defendant

3-5 days

2. How many witnesses do you intend to call at trial (*including opposing parties*)?

Plaintiff

4 to 6 witnesses.

Defendant

4 to 6 witnesses

3. How many exhibits do you anticipate using at trial?

Plaintiff

Approximately 20 exhibits.

Defendant

Approximately 20 exhibits.

D. PRETRIAL CONFERENCE:

A pretrial conference is usually conducted between a week to a month before trial, at which time a pretrial order will be signed by the court. [See LBR 7016-1.] If you believe that a pre-trial conference is not necessary or appropriate in this case, please so note below, stating your reasons:

Plaintiff

Pretrial conference ☐ is ☒ is not requested
Reasons:

The parties have entered into a settlement providing for dismissal of this adversary proceeding, dependent on a separate settlement in the Trustee's litigation.

Plaintiff

Pretrial conference should be set after:
(date) _____

Defendant

Pretrial conference ☐ is ☒ is not requested
Reasons:

If the settlement occurs then this case will be dismissed.

Defendant

Pretrial conference should be set after:
(date) _____

E. SETTLEMENT:

1. What is the status of settlement efforts?

The parties have entered into a global settlement agreement that provides for dismissal of this case in its entirety upon resolution of the Chapter 7 Trustee litigation. Plaintiffs understand that the settlement discussions between the Trustee and Susan Crone have reached an impasse.

2. Has this dispute been formally mediated? ☒ Yes ☐ No

If so, when?

The parties attended mediation before Judge Neil Bason on January 19, 2018.

3. Do you want this matter sent to mediation at this time?

Plaintiff

☐ Yes ☒ No

Defendant

☐ Yes ☒ No

F. FINAL JUDGMENT/ORDER:

Any party who contests the bankruptcy court's authority to enter a final judgment and/or order in this adversary proceeding must raise its objection below. Failure to select either box below may be deemed consent.

Plaintiff

☒ I do consent

☐ I do not consent

to the bankruptcy court's entry of a final judgment and/or order in this adversary proceeding.

Defendant

☒ I do consent

☐ I do not consent

to the bankruptcy court's entry of a final judgment and/or order in this adversary proceeding.

G. ADDITIONAL COMMENTS/RECOMMENDATIONS RE TRIAL: (Use additional page if necessary)


Plaintiffs' comments: The settlement of this action with Susan Crone is dependent on an independent settlement among the parties in the Chapter 7 Trustee's pending adversary proceeding (Adv. Case No. 14-ap-01276-BR) (the "Trustee Litigation"). While Global Advisors and the Trustee have agreed on terms for a global settlement in the Trustee Litigation, we understand that the Trustee and Susan Crone have reached an impasse in finalizing the remaining terms for settlement of the Trustee Litigation. If a settlement agreement in the Trustee Litigation is not finalized by April 30, 2019, the date of the Status Conference hearing in this case, Plaintiffs respectfully request that the Court issue a Scheduling Order with the discovery and trial related deadlines proposed herein.

Respectfully submitted,

Date: April 16, 2019

Friedman Law Group, P.C.

Printed name of law firm



Signature

Michael Sobkowiak, Esq.

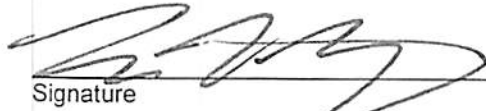
Printed name

Attorney for: CKR Global Advisors; Jeffrey A. Rinde

Date: 4-15-19

Flangas Law Firm

Printed name of law firm



Signature

Leonidas Flangas, Esq.

Printed name

Attorney for: Susan Crone

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

1900 Avenue of the Stars, 11th Floor, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled JOINT STATUS REPORT will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 4/16/2019, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Stephen F Biegenzahn efile@sfblaw.com
- Leslie A Cohen leslie@lesliecohenlaw.com, jaime@lesliecohenlaw.com;odalys@lesliecohenlaw.com
- Howard M Ehrenberg (TR) ehrenbergtrustee@sulmeyerlaw.com, ca25@ecfcbis.com;C123@ecfcbis.com;hehrenberg@ecf.inforuptcy.com
- J. Bennett Friedman jfriedman@flg-law.com, msobkowiak@flg-law.com;jmartinez@flg-law.com
- David B Golubchik dbg@lnbyb.com, dbg@ecf.inforuptcy.com
- Jeffrey S Kwong jsk@lnbyb.com, jsk@ecf.inforuptcy.com
- Theresa Mains theresa@theresamainspa.com
- Scott J Tepper scottjtepper@msn.com, scottjtepper@gmail.com

☐ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL**:

On (date) 4/16/2019, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

The Hon. Barry Russell
United States Bankruptcy Court
255 E. Temple Street, Suite 1660
Los Angeles, CA 90012

Leonidas P. Flangas
Flangas Law Firm, LTD
600 S. Third Street
Las Vegas, NV 89101

☐ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served)**: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

4/16/2019
Date

Chee Ane Bryant
Printed Name

/s/Chee`Ane Bryant
Signature